



UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

SAINT VINCENTS CATHOLIC MEDICAL CENTERS  
OF NEW YORK, et al.,

Chapter 11  
Case No. 10-11963 (CGM)

Debtors.

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**NOTICE OF MOTION TO ACCEPT REPLY MEMORANDUM OF LAW**

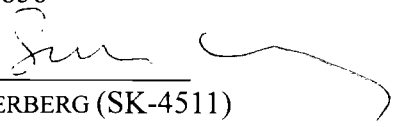
**PLEASE TAKE NOTICE** that upon the accompanying Reply Memorandum of Law, and all papers previously filed, the defendant New York State Department of Labor (“DOL”) will move pursuant to Bankruptcy Rules 9013 and 9014 on March 15, 2011 or as soon thereafter as counsel may be heard for acceptance and consideration of the accompanying Reply Memorandum of Law. It responds to reply papers filed and served by the Debtors and Creditors’ Committee on February 18, 2011 (Docket ## 1381 and ## 1382), which for the first time presented argument concerning an issue that is central to consideration of the Objection (Docket # 1090) at issue. Lest the propriety of the DOL’s submitting a Reply Memorandum of Law be questioned, the DOL respectfully files this motion.

Dated: February 24, 2011

PATRICIA KAKALEC  
Chief of Labor Bureau

SETH KUPFERBERG  
Chief of General Labor Section

ERIC T. SCHNEIDERMAN  
ATTORNEY GENERAL OF NEW YORK  
120 Broadway  
New York, New York 10271  
(212) 416-8856

By:   
SETH KUPFERBERG (SK-4511)  
Assistant Attorney General